

MHN

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CHRISTOPHER GROOMS,
EDDIE BRANTLEY,
STANLEY HUNTER,
UYLONDA HENDERSON, and
ALLISAH LOVE

Plaintiffs,

v.

CITY OF CHICAGO POLICE OFFICERS
DAVID TENCZA, #9203,
MICHELLE WANTUCK, #19973,
SERGEANT JOHN LEE, #909, and
THE CITY OF CHICAGO,

Defendants.

Case No. 07C 6176

Judge Andersen

Magistrate Judge Valdez

Jury Demanded

FILED

NOV 21 2007

**MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT**

FILED

NOV 21 2007

11-21-2007

**MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT**

**PLAINTIFFS MOTION TO PRESERVE 911 INTAKE CALLS, DISPATCH TAPES AND
EVENT ENTRIES VIA COMPUTER FROM THE OEMC, TAPES OF INTAKE CALLS
AND EVENT ENTRIES VIA COMPUTER FROM OPS, AND SECURITY
VIDEO/TAPES FROM THE CITY OF CHICAGO AUTO POUND**

1. Now comes the Plaintiff Allisah Love, requesting that this honorable court grant her motion to preserve the following: intake calls, dispatch tapes and event entries via computer from the City of Chicago Office of Emergency Management and Communications (OEMC); tapes of intake calls to The City of Chicago Office of Professional Standards (OPS); and Security Video/Tapes from the City of Chicago Auto Pound located at 10301 South Doty Avenue in Chicago. The following substantiates Plaintiffs request:

2. On November 20, 2007, Plaintiff Allisah Love was arrested on false charges by members of the City of Chicago Police Department while attempting to assist Plaintiff Uylonda Henderson in the retrieval of her vehicle at the City of Chicago Auto Pound located at 10301 South Doty Avenue.

3. The arrest of Plaintiff Allisah Love was an act of retaliation against her for prior complaints against the City of Chicago Police Department and for her involvement in federal case number 07C 6176, which was filed after the false arrest of her brother, Plaintiff Christopher Grooms and the unlawful search, seizure, detention and vehicle impoundment that he and the other Plaintiffs involved in this case endured.

4. Plaintiff Allisah Love contends that this motion is very time sensitive in regard to the preserving electronic communication that can make clear the events that transpired in the above named incident November 20, 2007 which resulted in her false arrest. This request for preservation is vital to Plaintiff's case. 911 tapes must be requested within 30 days of the incident for which they are requested.

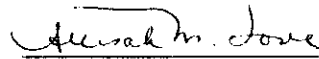
5. Plaintiff Allisah Love is requesting that the 911 intake calls, dispatch tapes and event entries via computer from the OEMC be preserved for the address of 10301 South Doty Avenue for the date of November 20, 2007, and for the phone numbers (312) 756-9329 and (312) 420-5054.

6. Plaintiff Allisah Love is also requesting that the intake calls and event entries via computer from OPS be preserved for the address of 10301 South Doty Avenue for the date of November 20, 2007, and for the phone numbers (312) 756-9329 as well as any calls made to OPS that same evening from the OEMC.

7. Plaintiff Allisah Love further requests that the security video/tapes from the City of Chicago Auto Pound located at 10301 South Doty Avenue for the date of November 20, 2007 be preserved; especially those retrieved from inside of the main trailer where people must go to process the paperwork for the release of their vehicle.

WHEREFORE, Plaintiff respectfully requests that this honorable court grant PLAINTIFFS MOTION TO PRESERVE 911 INTAKE CALLS, DISPATCH TAPES AND EVENT ENTRIES VIA COMPUTER FROM THE OEMC, TAPES OF INTAKE CALLS AND EVENT ENTRIES VIA COMPUTER FROM OPS, AND SECURITY VIDEO/TAPES FROM THE CITY OF CHICAGO AUTO POUND.

Respectfully Submitted on
behalf of all Plaintiffs,



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